In the matter of:

Gabriel S. Joseph III
FreeEats.com, Inc., dba
ccAdvertising
Americans in Contact PAC

MUR. 6746

### **COMPLAINT**

1. Citizens for Responsibility and Ethics in Washington ("CREW") and Melanie Sloan bring this complaint before the Federal Election Commission ("FEC") seeking an immediate investigation and enforcement action against Gabriel S. Joseph III, FreeEats.com, Inc., dba ccAdvertising, and the Americans in Contact Political Action Committee for direct and serious violations of the Federal Election Campaign Act ("FECA").

#### Complainants

- 2. Complainant CREW is a non-profit corporation, organized under section 501(c)(3) of the Internal Revenue Code. CREW is committed to protecting the right of citizens to be informed about the activities of government officials and to ensuring the integrity of government officials. CREW is dedicated to empowering citizens to have an influential voice in government decisions and in the governmental decision-making process. CREW uses a combination of research, litigation, and advocacy to advance its mission.
- 3. In furtherance of its mission, CREW seeks to expose unethical and illegal conduct of those involved in government. One way CREW does this is by educating citizens regarding the integrity of the electoral process and our system of government. Toward this end, CREW

monitors the campaign finance activities of those who run for federal office and those who make expenditures to influence federal elections, and publicizes those who violate federal campaign finance laws through its website, press releases, and other methods of distribution. CREW also files complaints with the FEC when it discovers violations of the FECA. Publicizing campaign finance violations and filing complaints with the FEC serves CREW's mission of keeping the public informed about individuals and entities that violate campaign finance laws and deterring future violations of campaign finance law.

- 4. In order to assess whether an individual or entity is complying with federal campaign finance law, CREW needs the information contained in disclosure reports political committees must file pursuant to the FECA, 2 U.S.C. §§ 434(a), (b); 11 C.F.R. §§ 104.1, 104.3. CREW is hindered in its programmatic activity when an individual or entity fails to disclose campaign finance information in reports required by the FECA.
- 5. CREW relies on the FEC's proper administration of the FECA's reporting requirements because the FECA-mandated disclosure reports are the only source of information CREW can use to determine if an individual or entity is complying with the FECA. The proper administration of the FECA's reporting requirements includes mandating that all disclosure reports required by the FECA are properly and timely filed with the FEC. CREW is hindered in its programmatic activity when the FEC fails to properly administer the FECA's reporting requirements.
- 6. Complainant Melanie Sloan is the executive director of Citizens for
  Responsibility and Ethics in Washington, a citizen of the United States, and a registered voter
  and resident of the District of Columbia. As a registered voter, Ms. Sloan is entitled to receive

information contained in disclosure reports required by the FECA, 2 U.S.C. § 434; 11 C.F.R. §§ 104.1, 104.3. Ms. Sloan is harmed when an individual, candidate, political committee, or other entity fails to report campaign finance activity as required by the FECA. See FEC v. Akins, 524 U.S. 11, 19 (1998), quoting Buckley v. Valeo, 424 U.S. 1, 66-67 (1976) (political committees must disclose contributors and disbursements to help voters understand who provides which candidates with financial support). Ms. Sloan is further harmed when the FEC fails to properly administer the FECA's reporting requirements, limiting its ability to review campaign finance information.

# Respondents

- 7. Gabriel S. Joseph III ("Joseph") is, simultaneously, the president of FreeEats.com, lnc., dba ccAdvertising ("ccAdvertising"), and the treasurer of the Americans in Contact Political Action Committee ("AICPAC").
- 8. ccAdvertising is a telemarketing company that provides telephone survey, polling, and message delivery services ("robocalls") to federal and state candidates and political committees from its offices at 5900 Fort Drive, Suite 302, Centreville, Virginia 20121.
- 9. AICPAC purports to be a nonconnected political committee that has been registered as such with the FEC since October 1, 2008.

# Factual Allegations

10. On Tuesday, October 30, 2012, hundreds of cellular telephone users in the Washington, D.C. area began receiving unsolicited text messages expressly advocating the defeat of President Obama in the general election to be held one week later on November 6, 2012. One text message said, "The Obama administration perpetuated misinformation about

Libya. Vote against Obama!" Another message said, "Obama supports homosexuality and its radical social agenda. Say No to Obama on Nov 6!" None of the text messages contained a disclaimer indicating who paid for the messages. Mike Debonis, Anti-Obama text messages linked to Centreville firm, Washington Post (October 31, 2012)(attached as Exhibit A); Brendan Sasso, GOP ad firm defends anti-Obama texts as protected speech, The Hill (November 2, 2012)(attached as Exhibit B). See also David A. Graham, The Strange Anti-Obama Texts Blowing Up D.C.-Area Cell Phones, The Atlantic (October 31, 2012)(attached as Exhibit C).

- 11. The text messages originated as e-mails from a number of different Web domains, including votersett.com, informedett.com, republicanett.com, and GOPmessage.com. On Wednesday, October 31, 2012, GoDaddy.com revealed that these domains were registered to Gabriel S. Joseph III, the CEO of ccAdvertising and the treasurer of AICPAC, and were owned by ccAdvertising. See Exhibits A-C. Neither Joseph nor ccAdvertising initially responded to requests for comment on the text messages, but ccAdvertising posted this message on its website: "In the more than 12 years since it's [sic] founding and currently, ccAdvertising has scrupulously complied with all laws and regulations affecting its activities." Aamer Madhani and Gregory Korte, Virginia company tied to anti-Obama texts, USA Today (October 31, 2012)(attached as Exhibit D).
- 12. Joseph subsequently admitted that the text messages had been sent by ccAdvertising. In an interview with *The Hill*, he said that "he sent the messages on behalf of a client, but he declined to name the client or disclose how many messages he sent." See Exhibit B. In fact, the text messages had been ordered and paid for by Joseph himself in his capacity as

treasurer of AICPAC. AICPAC reported paying ccAdvertising \$5,943.67 to send the text messages opposing the re-election of President Obama. See Americans in Contact PAC, <u>FEC Schedule E, 24/48 Hour Notice of Independent Expenditures</u>, October 31, 2012 (electronically signed by Gabriel S. Joseph III)(attached as Exhibit E).

- 13. On October 1, 2008, Mr. Joseph filed a Statement of Organization for AICPAC with the Federal Election Commission indicating that AICPAC was a nonconnected committee. Indeed, Mr. Joseph emphasized on the Statement of Organization form that AICPAC had no connected organization by circling the words "Connected" and "None" in response to question 6. See Americans in Contact PAC, FEC Form 1, Statement of Organization (October 1, 2008)(attached as Exhibit F).
- 14. On information and belief, AICPAC was established by Mr. Joseph in his capacity as president of ccAdvertising and is administered and financially supported utilizing the resources and facilities of ccAdvertising for the purpose of generating revenue for ccAdvertising.
- 15. The major purpose of a nonconnected committee must be the election of candidates. *Buckley v. Valeo*, 424 U.S. 1, 79 (1976). The major purpose of AICPAC, however, appears to be generating revenue for ccAdvertising. Since its creation in 2008, AICPAC has reported making \$496,659 in expenditures to ccAdvertising nearly 68 percent of all of the expenditures made by AICPAC since 2008. In contrast, AICPAC has contributed only \$43,750 directly to federal and state candidates since its inception in 2008 less than 6 percent of all its expenditures.

- 16. AICPAC contributions typically go to committees that employ ccAdvertising as a vendor. Moreover, in many cases when AICPAC makes a contribution to a committee, the contribution is followed shortly thereafter by a payment to ccAdvertising. For example, AICPAC made a \$5,000 contribution to Reagan PAC on January 31, 2010. See Reagan PAC, FEC Form 3X, 2010 February Monthly Report at 6. (February 19, 2010)(attached as Exhibit G). Reagan PAC then made a payment of \$5,000 on April 19, 2012 to ccAdvertising for solicitation calls. See Reagan PAC, FEC Form 3X, 2010 May Monthly Report at 6. (May 19, 2010)(attached as Exhibit H). Similarly, AICPAC made a contribution of \$2,000 to Huck PAC on May 9, 2011 and Huck PAC then made a payment of \$10,000 to ccAdvertising on May 23, 2011. See Huck PAC, FEC Form 3X, 2012 Mid-Year Report at 108, 116 (June 6, 2012)(attached as Exhibit I). In addition, AICPAC made a contribution of \$500 to Steve Daines for Montana on September 25, 2012. See Steve Daines for Montana, FEC Form 3X, 2012 October 15 Quarterly Report at 241 (October 15, 2012)(attached as Exhibit J). Steve Daines for Montana then made a payment of \$1,000 to ccAdvertising on October 12, 2012. See Steve Daines for Montana, FEC Form 3X, 2012 Pre-General Report at 58 (October 25, 2012)(attached as Exhibit K).
- 17. On its website, AICPAC states that its goal is "to identify the political opinions and preferences of the 120,000,000 homes in America that are contained in proprietary databases to which AICPAC has access." See <a href="http://www.americansincontact.org/about-2/">http://www.americansincontact.org/about-2/</a> (screenshot attached as Exhibit L).
- 18. These proprietary databases belong not to AICPAC, but to ccAdvertising. ccAdvertising's website states that the company "maintains an extensive, two-week current

database of 120,000,000 homes in America. This database is suitable for mailing lists and phone lists." See <a href="http://www.ccadvertising.biz/">http://www.ccadvertising.biz/</a> (screenshot attached as Exhibit M).

- 19. On information and belief, Mr. Joseph has gone to elaborate lengths to portray AICPAC as a nonconnected committee, when, in fact, AICPAC is administered by Mr. Joseph using the resources and facilities of ccAdvertising located at Suite 302, 5900 Fort Drive, Centreville, Virginia. AICPAC's official address is a post office box in Alexandria, Virginia located in the same U.S. Post Office building as the post office box for AICPAC's accounting firm, Koch & Hoos, LLC. See Americans in Contact PAC, FEC Form 3X, 2012 Pre-General Report at 1,7 (October 22, 2012)(attached as Exhibit N). On information and belief, the Alexandria, Virginia post office box utilized by AICPAC was rented by Koch & Hoos, LLC at the direction of Mr. Joseph and ccAdvertising in order to make it appear that ccAdvertising was not the connected organization of AICPAC.
- 20. AICPAC has reported making 45 separate payments of approximately \$200 each for "rent" to HQ Global Workplaces, 1200 G Street, N.W., Suite 800, Washington, D.C. 20005. See, e.g., Americans in Contact PAC, FEC Form 3X, 2012 October 15 Quarterly Report at 9-10 (October 15, 2012)(attached as Exhibit O). HQ Global Workplaces is a division of Regus USA, a provider of virtual office space. The only service that HQ Global Workplaces provides at its 1200 G Street, N.W. location at the rate of \$200 per month is a telephone answering and forwarding service. See <a href="http://www.regus.com/locations/virtual-office/district-of-columbia-washington-metro-center">http://www.regus.com/locations/virtual-office/district-of-columbia-washington-metro-center</a> (screenshot attached as Exhibit P). On information and belief, anyone calling the telephone number for AICPAC would have their call forwarded to Mr. Joseph in ccAdvertising's offices at Suite 302, 5900 Fort Drive, Centreville, Virginia. On information

and belief, AICPAC's use of the telephone answering and forwarding services provided by HQ Global Workplaces is designed solely to make it appear that ccAdvertising is not the connected organization of AICPAC.

### Count I

- 21. The FECA defines a "connected organization" as any organization which is not a political committee but which directly or indirectly establishes, administers, or financially supports a political committee. 2 U.S.C. § 431(7). Commission regulations specify that a connected organization may be a corporation. 11 C.F.R. § 100.6(a). For purposes of determining whether a corporation is the connected organization of a political committee, the term "financially supports" includes the payment of establishment, administration, and solicitation costs of the political committee. 11 C.F.R. § 100.6(c).
- 22. The Commission's regulations specify that all political committees, including separate segregated funds, established, financed, maintained, or controlled by the same corporation, person, or group of persons are *per se* affiliated. 11 C.F.R. § 100.5(g)(2); see also 11 C.F.R. § 110.3(a)(2).
- 23. In the absence of *per se* affiliation, 11 C.F.R. § 114.5(g) provides for a case-by-case examination of various factors to determine whether a corporation is affiliated with (i.e., is the connected organization of) a political committee. 11 C.F.R. § 100.5(g)(4)(i) and (ii)(A)-(J); see also 11 C.F.R. § 110.3(a)(3)(i) and (ii)(A)-(J). The Commission examines these factors in the context of the overall relationship between the corporation and the political committee to determine whether the presence of <u>any factor</u> or factors is evidence that the corporation is affiliated with the political committee. 11 C.F.R. §§ 100.5(g)(4)(ii) and 110.3(a)(3)(ii)

(emphasis added). The factors include: (1) whether the corporation has the ability to direct or participate in the governance of a political committee through formal or informal practices or procedures; (2) whether a corporation has common or overlapping officers, directors, or employees with a political committee which indicates a formal or ongoing relationship between the corporation and the political committee; (3) whether a corporation provides funds on an ongoing basis to a political committee, such as through direct or indirect payments for administrative, fundraising, or other costs; (4) whether a corporation or its agents had an active or significant role in the formation of the political committee; and (5) whether a political committee has a pattern of contributions which indicates a formal or ongoing relationship with a corporation. 11 C.F.R. § 100.5(g)(4)(ii)(B), (E), (G), (I) and (J); see also 11 C.F.R. § 110.3(a)(3)(ii)(B), (E), (G), (I) and (J). These factors are not an exclusive list, and other factors may be considered. FEC Advisory Opinion 1995-36.

- 24. Even a cursory review of the relationship between ccAdvertising and AICPAC demonstrates that ccAdvertising must, under the Commission's regulations, be considered to be the connected organization of AICPAC, either by applying the single factor or multiple factor tests.
- 25. The Commission's regulations require it to review the overall relationship between the corporation and the political committee to determine whether the presence of any factor is evidence that the corporation is the connected organization of the political committee.

  11 C.F.R. §§ 100.5(g)(4)(ii) and 110.3(a)(3)(ii) (emphasis added). Here, the fact that the same individual, Gabriel S. Joseph III, serves simultaneously as the treasurer of AICPAC and the president of ccAdvertising is sufficient for the Commission to determine that ccAdvertising is

the connected organization of AICPAC. <u>See also</u> FEC Advisory Opinion 1988-14 (finding two corporations to be affiliated because "the governing bodies of each corporation overlap and many of the same people are vested with authority to direct both corporations.").

- 26. Even if that single factor were not sufficient to demonstrate that ccAdvertising and AICPAC were connected, a simple review of only those facts that are on the public record demonstrates that at least five factors of the Commission's multiple factor test support such a determination.
- 27. First, the Commission must consider whether the corporation has the ability to direct or participate in the governance of the political committee through formal or informal practices or procedures. 11 C.F.R. § 100.5(g)(4)(ii)(B); see also 11 C.F.R. § 110.3(a)(3)(ii)(B). The same individual, Gabriel S. Joseph III, has day-to-day operational control of both ccAdvertising and AICPAC. That ability to simultaneously control both organizations demonstrates that ccAdvertising has, at the very least, the ability to direct or participate in the governance of AICPAC through informal practices or procedures.
- 28. Second, the Commission must consider whether a corporation has common or overlapping officers, directors, or employees with a political committee, which indicate a formal or ongoing relationship between the corporation and the political committee. 11 C.F.R. § 100.5(g)(4)(ii)(E); see also 11 C.F.R. § 110.3(a)(3)(ii)(E). Here the evidence of affiliation is overwhelming. Obviously there is an overlap between the officers, directors, and employees of ccAdvertising and AICPAC the same individual, Gabriel S. Joseph III, serves simultaneously as the chief executive of both organizations. Clearly the public record provides compelling evidence that the common officers, directors, and employees of ccAdvertising and AICPAC

demonstrate that there is an ongoing relationship between the corporation and the political committee.

- 29. Third, the Commission must consider whether a corporation provides funds on an ongoing basis to a political committee, such as through direct or indirect payments for administrative, fundraising, or other costs. 11 C.F.R. § 100.5(g)(4)(ii)(G); see also 11 C.F.R. § 110.3(a)(3)(ii)(G). Here the evidence available on the public record indicates that Mr. Joseph personally administers AICPAC using the resources and facilities of ccAdvertising. AICPAC proudly proclaims on its website that it has access to proprietary databases of consumer information databases, in fact, owned by ccAdvertising. The "rent" paid by AICPAC for its "offices" at 1200 G Street, N.W., Washington, D.C. is nothing more than an elaborate subterfuge to conceal the fact that Mr. Joseph actually administers AICPAC from his office at ccAdvertising at 5900 Fort Drive, Centreville, Virginia.
- 30. Fourth, the Commission must consider whether a corporation or its agents had an active or significant role in the formation of the political committee. 11 C.F.R. § 100.5(g)(4)(ii)(I); see also 11 C.F.R. § 110.3(a)(3)(ii)(I). Here the president of ccAdvertising was solely responsible for establishing AICPAC. Gabriel S. Joseph III filed the Statement of Organization form establishing AICPAC with the Commission.
- 31. Fifth, the Commission must consider whether the contribution pattern of the political committee indicates a formal or ongoing relationship with the corporation. 11 C.F.R. § 100.5(g)(4)(ii)(J); see also 11 C.F.R. § 110.3(a)(3)(ii)(J). Here, there is overwhelming evidence that contributions by AICPAC are specifically designed to financially benefit ccAdvertising. AICPAC typically makes contributions to political committees that are clients

of ccAdvertising. Moreover, there are numerous instances in which contributions by AICPAC appear to have been used by political committees to pay ccAdvertising for its services.

- 32. The evidence in the public record clearly shows that, under either the single factor or multiple factor tests established by the Commission's regulations, ccAdvertising is the connected organization of AICPAC. Moreover, because Gabriel S. Joseph III was president of ccAdvertising when AICPAC was established, the evidence demonstrates that Gabriel S. Joseph III knowingly made a false statement to the Commission when he filed a Statement of Organization claiming that AICPAC had no connected organization. Any person who signs a Statement of Organization form that contains false information is subject to civil penalties pursuant to 2 U.S.C. § 437g. More importantly, knowingly making a false statement to the Commission is a criminal violation of 18 U.S.C. § 1001.
- 33. The evidence in the public record clearly shows that AICPAC is not a nonconnected committee, but is instead a separate segregated fund of ccAdvertising. A nonconnected committee is free to raise funds from the general public, while a separate segregated fund may only raise funds from a restricted class of executive and administrative personnel employed by the fund's connected corporation. 2 U.S.C. § 441b(b)(4)(A)(i). Since its inception in 2008, AICPAC has raised approximately three-quarters of a million dollars (\$750,000) from the general public. Because the evidence in the public record clearly indicates that AICPAC is the separate segregated fund of ccAdvertising, the vast majority of that three-quarters of a million dollars (\$750,000) was raised in violation of 2 U.S.C. § 441b(b)(4)(A)(i).

### Count II

- 34. The FECA and FEC regulations require that an independent expenditure contain a disclaimer that clearly states the name and permanent street address, telephone number, or World Wide Web address of the person who paid for the communication, and state that the communication is not authorized by any candidate or candidate's committee. 2 U.S.C. § 441d(a)(3); 11 C.F.R. § 110.11(a)(3).
- 35. By failing to disclose the required information on the independent expenditures that were disseminated on October 30, 2012, AICPAC and Mr. Joseph, personally and in his capacity as treasurer of AICPAC, violated 2 U.S.C. § 441d(a)(3) and 11 C.F.R. § 110.11(a)(3).

### Conclusion

WHEREFORE, Citizens for Responsibility and Ethics in Washington and Melanie Sloan request that the FEC conduct an investigation into these allegations, declare the respondents to have violated the FECA and applicable FEC regulations, impose sanctions appropriate to these violations and take such further action as may be appropriate, including referring this case to the Department of Justice for criminal prosecution.

ON BEHALF OF COMPLAINANTS

Melanie Sloan
Executive Director
Citizens for Responsibility and Ethics in
Washington
1400 Eye St., N.W., Suite 450
Washington, D.C. 20005
(202) 408-5565 (phone)
(202) 588-5020 (fax)

# Verification

Citizens for Responsibility and Ethics in Washington and Melanie Sloan hereby verify that the statements made in the attached Complaint are, upon information and belief, true.

Sworn pursuant to 18 U.S.C. § 1001.

Melanie Sloan

Sworn to and subscribed before me this 1st day of August, 2013.

Notary Public



CARRIE LEVINE
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires February 28, 2018

EXHIBIT A

# The Washington Post ein

# Anti-Obama text messages linked to Centreville firm

By Mike DeBonis, Updated: October 31, 2012

Tuesday night, I got an <u>unsolicited anti-Barack Obama message</u> on my cell phone: "Obama denies protection to babies who survive abortions. Obama is just wrong," read the text.

Judging from Twitter, that message and others like it ("the Obama administration perpetuated misinformation about Libya. Vote against Obama!"; "Obama is using your tax dollars to fund Planned Parenthood and abortions. Is that right") hit many hundreds, if not thousands, of phones in the D.C. area.

The messages originated as e-mails, and they came from a variety of domains including votersett.com, informedett.com, republicanett.com and GOPmessage.com. (The "ett" suffix appears to refer to "e-mail to text" — more on that shortly.)

Those domains, as <u>IT World reported Wednesday morning</u>, are linked to ccAdvertising, a Centreville company that does direct voter contact via robocalls.

GoDaddy.com registration data currently lists "G Joseph" as the registrant behind those domains. Gabriel S. Joseph III is ccAdvertising's president; attempts to reach him Wednesday were not immediately successful. The person who answered the phone at ccAdvertising Wednesday, after inquiring if I'd like to be added to a do-not-contact list, said Joseph was "not available" but would pass on a message.

According to DailyKos, the GoDaddy site earlier Wednesday listed the domains' registrant as Jason Flanary, who ran last year as a Republican to represent Fairfax County in the Virginia state senate and has ties to ccAdvertising. A year ago, Virginia Democrats and others <u>lodged complaints with authorities</u> about similar texts carrying messages pertaining to Flanary's race and other races.

CcAdvertising lists Burger King, the Washington Capitals, and various Republican politicians and groups <u>among its clients</u>. It's unclear who may have paid for the Tuesday texts or otherwise authorized them, considering the utility of sending anti-Obama texts to the deep-blue 202 area code is questionable at best.

While spam text messages are generally illegal under federal law, Tuesday night's political texts <u>flew through a loophole</u> because they were in fact sent as e-mails. Unsolicited political e-mails are exempt from federal spam restrictions.

In February, the Federal Communications Commission issued rules that would restrict the use of robocalls and "email-to-text" marketing for commercial purposes,

but left political messages unscathed. In a news release, Joseph <u>hailed the ruling</u>: "We have not and will not engage in telemarketing using our proprietary ... technologies. Free Speech is still protected."

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EXHIBIT B

# THEAHILL



# GOP ad firm defends anti-Obama texts as protected speech

By Brendan Sasso - 11/02/12 11:05 AM ET

The Republican marketing firm that bombarded people's cellphones with unsolicited anti-Obama text messages this week is undeterred by criticism of the practice, claiming it is protected by its right to free speech.

Gabriel Joseph, president of Virginia-based ccAdvertising, told The Hill on Friday that he believes the text messages are an effective campaign tactic and he is open to sending more of them before the election on Tuesday.

"The fact that some people are bothered by this doesn't offend me at all," Joseph said. "It means what we're doing is working. It means it's effective."

Joseph said he sent the messages on behalf of a client, but he declined to name the client or disclose how many messages he sent.

Many people in the Washington, D.C., metro area received the messages, but Joseph wouldn't say whether he targeted a particular region.

He said he obtained the phone numbers from publicly available records, that his firm is "scrupulous" in following the law and that he was only exercising his right to free speech.

"We live in a country called America. We don't live in Russia or China or Iran or Syria where they restrict free speech," Joseph said.

The text messages, sent on Tuesday night, covered a variety of topics, including gay rights, abortion and Medicare, and reached people who had never asked to receive them.

"Obama supports homosexuality and its radical social agenda. Say No to Obama on Nov 6!" one message read.

"The average American pays at least \$2,000 more in taxes than 4 years ago. STOP OBAMA!" read another.

Jonathan Weisman, a reporter for The New York Times, tweeted that his 13-year-old daughter received a text reading: "Obama denies protection to babies who survive abortions. Obama is just wrong."

Federal Communications Commission regulations and the Telephone Consumer Protection Act of 1991 prohibit unsolicited auto-dialed text messages.

The law allows for a \$16,000 fine for each illegal message. The rules for text-message spam are stricter than email spam because text messages are more invasive and can result in extra charges for consumers who do not have unlimited texting on their cellphone plans.

ccAdvertising sent the messages from websites rather than phone numbers.

The FCC is considering a petition that would clarify that the law covers Web-to-phone messages in addition to phone-to-phone messages.

The onslaught of political text messages sparked outrage on Twitter and other social media sites on Tuesday night, as people complained about the unusual campaign tactic.

The Human Rights Campaign, a gay-rights group, sent a letter to the FCC calling for an investigation into the messages, which it called "blatant" violations of the Telephone Consumer Protection Act.

"The TCPA and other laws were created precisely to protect consumers from scammers who send fraudulent messages while hiding behind a cloak of anonymity," the Human Rights Campaign wrote, calling for "swift and forceful action" against ccAdvertising.

GoDaddy, a Web registrar, initially suspended the websites that ccAdvertising used to send the messages, citing spam and abuse.

But Joseph said he has been in contact with GoDaddy and the accounts are no longer suspended.

Joseph claimed that people opted in to receiving political communications when they registered to vote.

He argued that because many people have abandoned landline phones for cellphones, text messages are one of the most effective ways to communicate with voters. He said he has been thrilled with the reaction to his messages.

"You win elections when your opponents react to what you do," he said.

He argued that liberal groups have the same right to send unsolicited text messages and that they would be smart to do so.

"No, I'm not ashamed of it, and I don't shirk away from it," Joseph said. "The articles that have been written have helped my business."

http://thehill.com/blogs/hillicon-valley/technology/265569-gop-ad-firm-defends-anti-obama-texts-asprotected-speech

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EXHIBIT C

# the Atlantic



Print | Close



# THE SEXES he newest channel on The Atlantic.com





# The Strange Anti-Obama Texts Blowing Up D.C.-Area Cell Phones

By David A. Graham

The messages, from mysterious email addresses, attack the president on Medicare, abortion, and more.

# Updated, 11:22 p.m.

With the worst of Hurricane Sandy past, many D.C.-area residents have been hearing from far-flung friends checking in to make sure they're fine. But some denizens of Washington and the surrounding area have been getting unsolicited texts that don't come from old friends. On Twitter Tuesday night, political operatives and journalists reported receiving spam texts attacking President Obama. The texts come not from phone numbers but from email addresses, most with mysterious domains: sms@gopmessage.com, sms@votegopett.com, sms@voteett.com. According to Whois.com, which allows searches of domain-name owners, those domains were all registered in February, but the registrant's name is blocked.

That makes it tough to figure out where the texts are coming from. But here's a sample of what they're saying. *New York Times* reporter Jonathan Weisman notes that his teen daughter received one (he was not happy about it):



Jonathan Weisman @jonathanweisman

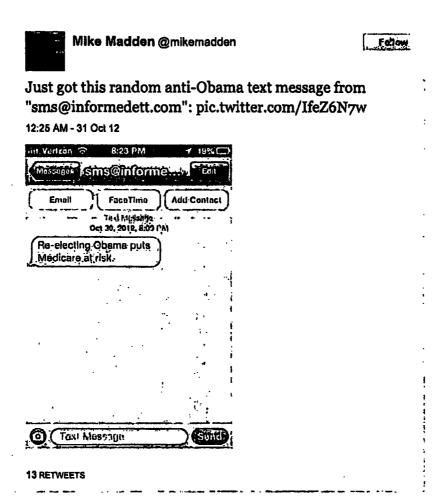
Fallow

Txt to my 13-yr-old daughter: "Obama denies protection to babies who survive abortions. Obama is just wrong" from sms@gopmessage.com

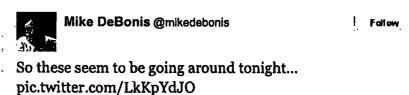
1:35 AM - 31 Oct 12

158 RETWEETS 12 FAVORITES

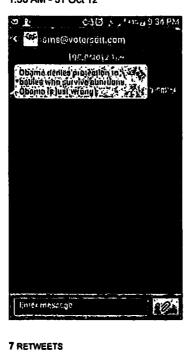
From Washington City Paper's Mike Madden:



The Washington Post's Mike DeBonis:



1:38 AM - 31 Oct 12



As CNN's Jim Spellman discovered, you can't even reply to the mysterious messages:

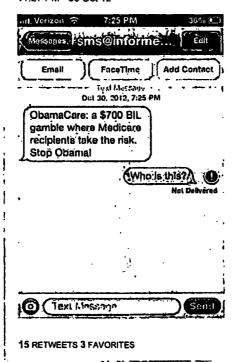


# jim spellman @jimspellmancnn

Follow

A new low for these political campaigns: text messages? Please give us a break! #ElectionFatigue pic.twitter.com/Ja4mgxHc

11:27 PM - 30 Oct 12



As the Los Angeles Times explained in September, whoever is sending the texts is exploiting a legal loophole. It's illegal to send unsolicited, automated texts, but it is apparently within the bounds of the law to send them as emails. That's why the sender appears as an email, even though recipients view them as texts. Adding insult to injury, recipients are charged for the messages just like regular texts. (Although all of these shots are iPhones, at least one Android user has received the texts as well.)

The messages run a gamut of domestic issues, and don't seem to discriminate by as to fiscal or social issues: entitlements, abortion, and gay rights are among the reported texts. And it's tough to tell who exactly is receiving the messages, since Washington-area journalists are probably disproportionately represented among Twitter users. But they do seem to be bearing the brunt of the messages. If so, that makes for poor electioneering, since they're unlikely to be swayed by the texts. As NPR's David Folkenflik snarked it:



#### David Folkenflik @davidfolkenflik

Follow

After 20+ yrs as a reporter, I can unequivocally say there's no more authoritative source than an unsolicited & anonymous text message.

2:14 AM - 31 Oct 12

34 RETWEETS 14 FAVORITES

If, on the other hand, the goal is attention, it's a clever stratagem.

Have you received any anonymous attack texts? What did they say? Let us know as we track the story.

Update: Atlantic contributor Philip Bump has been collecting data via an informal online survey (you can add your info here). Of the roughly 30 messages he's logged so far, all of them have been in D.C., Maryland, or Virginia. Most of them are to registered voters — all of them either Democrats or independents.

This article available online at:

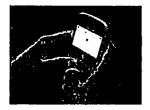
http://www.theatlantic.com/politics/archive/2012/10/the-strange-anti-obama-texts-blowing-up-dc-area-cell-phones/264329/

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EXHIBIT D

# Virginia company tied to anti-Obama texts

Aamer Madhani and Gregory Korte, USA TODAY 10:49a.m. EDT November 1, 2012



(Photo: Mell Sayles, AP)

WASHINGTON — A Virginia firm with deep ties to GOP politicians and conservative causes faced scrutiny Wednesday after sending unsolicited robotext messages criticizing President Obama to an unknown number of mobile phones in the Washington metro area on Tuesday.

It's illegal to send unsolicited automated text messages, but the company linked to the messages, ccAdvertising, a political research firm, may have entered into a gray area in the rules set by the Federal Communications Commission by sending the message as e-mails to phone numbers as texts, not as phone-to-phone texts.

Among the messages: "Medicare goes bankrupt in 4000 days while Obama plays politics with senior health"; "Obama denies protection to babies who survive abortions. Obama is just wrong"; "Obama wants to invest in Planned Parenthood instead of your future."

The messages originated from a variety of domains including votersett.com, informedett.com, republicanett.com and GOPmessage.com. The texts included no information about who the sender was.

The Centreville, Va., company linked to the messages did not respond to requests for comment, but the company posted this message on its website: "In the more than 12 years since its founding and currently, ccAdvertising has scrupulously complied with all laws and regulations affecting its activities."

The company has worked for for former GOP presidential contenders Herman Cain, Michele Bachmann and Newt Gingrich, and Missouri Senate hopeful Todd Akin.

Nick Fuller, spokesman for GoDaddy.com, which hosts some of the domains belonging to ccAdvertising, confirmed that some of the domains were suspended Wednesday. But it appeared that several belonging to ccAdvertising were active as of late Wednesday. GoDaddy.com prohibits its clients from spamming as part of its terms of service agreement.

The Obama campaign declined to comment. But Scott Goodstein, a Democratic tech consultant who heads the group Revolution Messaging, said ccAdvertising's technique is problematic for a number of reasons, including that many recipients did not opt-in to receive these messages and ultimately end up having to pay the cost for unwanted texts to their mobile phone.

Earlier this year, Goodstein's group, Revolution Messaging, filed a petition with the FCC and asked it to "declare ... this internet to text message political spam is illegal."

"As an active form of communication, even if you already read half of their message before deleting it, you've gotten some form of messaging that cuts through the clutter in the political world crowded by direct mail and television advertising saturation," Goodstein said. "The problem with it is that it is coming from an unknown source and spewing nefarious information to a device that you didn't request information be sent to," Goodstein said.

The largest active client of ccAdvertising is the Faith Family Freedom Fund, a super PAC allied with Family Research Council Action, the Christian activist group headed by Tony Perkins, according to Federal Election Commission reports.

The super PAC has paid ccAdvertising \$165,000 this year, mostly for "generic get-out-the-vote calls," according to FEC records. Reached on Wednesday, Family Research Council spokesman J.P. Duffy said he was looking into whether the group had any connection to the text messages.

Over the years, the company has done business under several different names. Several of the domains used in the anti-Obama text messages were registered to G Joseph. In a 2007 profile in the magazine Mother Jones, the company's president, Gabriel Joseph III, was described as one of the "kings of the political robo-call."

EXHIBIT E

Signature

#### 10/31/2012 16:32 Image# 12961225879 24/48 HOUR NOTICE OF INDEPENDENT EXPENDITURES (SCHEDULE E) OF FOR SE OF FORM 24/48 NAME OF COMMITTE (In Full) FEC IDENTIFICATION NUMBER ▼ Americans In Contact PAC C00455444 Check If 24-hour report 48-hour report New report Amends report filed on Full Name (Last, First, Middle Initial) of Payee Date ccAdvertising 2012 Malling Address 6900 Fort Dr Ste 302 Amount City State Zlp Code 5943.67 VA Centreville 20121-2425 Transaction ID : SE.4257 State: Purpose of Expenditure Office Sought: House Category/ **Phone Communication** Senate Type District: President Name of Federal Candidate Supported or Opposed by Expenditure: Check One: Support Opposo **BARACK OBAMA** Disbursement For: Primary Calendar Year-To-Date Per Election 5943.67 Other (specify) for Office Sought Full Name (Last, First, Middle Initial) of Payee Mailing Address Amount City State ZIp Code Státe: Office Sought: House Purpose of Expenditure Category/ Type Senate District: President Name of Federal Candidate Supported or Opposed by Expenditure: Oppose Check One: Support Disbursement For: Primary Calendar Year-To-Date Per Election Other (specify) for Office Sought 5943.67 (a) SUBTOTAL of Itemized Independent Expenditures..... (b) SUBTOTAL of Unitermized Independent Expenditures .... (c) TOTAL Independent Expenditures..... 5943.67

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Gabriel S. Joseph III		[Electronically Filed]	Date 10 31 2012	,	
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EXHIBIT F

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RECEIVED FEDERAL ELECTION COMMISSION PUSEIG DISCLOSKRE STATEMENT OF DIVIGION FEC **ORGANIZATION FORM** 2000 OCT - 1 (See instructions) Office use only NAME OF COMMITTEE (in full) Example: If typying, type over the lines (Check if name is changed) 12FE4M5 ı; Americans In Contact PAC ADDRESS (number and street) (Check if address la changed) CITY STATE ZIP CODE COMMITTEE'S E-MAIL ADDRESS AmericansinContactPAC@gmail.com COMMITTEE'S WEB PAGE ADDRESS (URL) COMMITTEE'S FAX NUMBER 2. DATE **FEC IDENTIFICATION NUMBER** IS THIS STATEMENT NEW (N) OR AMENDED (A) I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete Gabriel S. Joseph Type or Print Name of Transuggr 70'01'2008 Signature of Treasurer NOTE: Submission of false, erroneous, or incomplets information may subject the person signing this Statement to the penalties of 2 U.S.C. S437g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS

For further Information contact: Federal Election Commission Toll Free 800-424-9830 Local 202-894-1100

**FEC FORM 1** (Revised 12/2007)

FEC Form 1 (Revised 12/2007)			Page 2
TYPE OF COMMITTEE (Check One)			•
Candidate Committee:			
(e) This committee is a principal campaign	n committee. (Complete the ca	ndidate information below.)	
(b) This committee is an authorized comming information below.)	elitee, and is NOT a principal c	ampaign committee. (Comp	plete the candidate
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(c) This committee supports/opposes only	one candidate, end is NOT ar	authorized committee.	
Name of Candidate L.L	<u></u>		
Party Committee:			
(d) This committee is a	(National, State (or subordinate) committe	se of the	(Democratic. Republicen,etc.) Party.
Political Action Committee (PAC):	<del></del>	<del></del>	<del> </del>
(e) This committee is a separate segregate	ed fund. (identify connected or	ganization on line 6.) its co	nnected organization is a:
Corporation	Corporation w/o Cap	iltal Stock j	Labor Organization
Membership Organization	Trade Association		Cooperative
(f) X: This committee supports/opposes more committee. (i.e., nonconnected commit		and is NOT a separate seg	regated fund or party
in eddition, this committee is a Lo	eadership PAC. (Identify spon	eor on line 6.)	
Joint Fundralsing Representative:		•	
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Full Name Gabrie	P.O. Box 204		ZIP CODE A
Full Name Gabrie  Malling Address  Title or Position ♥	P.O. Box 204  Alexandris		<del></del>
Full Name  Mailing Address  Title or Position   Custodiar  Treasurer: List the name name and address of any	P.O. Box 204  Alexandria	VA  STATE  Telephone number	ZIP CODE A - 222 - 5474
Full Name  Malling Address  Title or Position V  Custodiar  Treesurer: List the name name and address of any  Full Name	P.O. Box 204  P.O. Box 204  Alexandria  CITY A  and address (phone number — optional) of designated agent (e.g., assistant treasure	VA  STATE  Telephone number	ZIP CODE A - 222 - 5474
Full Name  Mailing Address  Title or Position   Custodiar  Tressurer: List the name name and address of any  Full Name of Tressurer  Gabrie	P.O. Box 204  P.O. Box 204  Alexandria  CITY A  and address (phone-number — optional) of designated agent (e.g., assistant treasure)  el S. Joseph; III	VA  STATE  Telephone number	ZIP CODE A - 222 - 5474
Full Name  Malling Address  Title or Position V  Custodiar  Tressurer: List the name name and address of any  Full Name of Tressurer  Gabrie	P.O. Box 204  P.O. Box 204  Alexandria  CITY A  and address (phone-number — optional) of designated agent (e.g., assistant treasure)  el S. Joseph; III	VA  STATE  Telephone number	ZIP CODE A - 222 - 5474
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Full Name  Malling Address  Title or Position   Custodiar  Treasurer: List the name name and address of any  Full Name of Treasurer  Malling Address	P.O. Box 204  Alexandria  CITY A  and address (phone number — optional) of designated agent (e.g., assistant treasure)  P.O. Box 204  Alexandria  CITY A	STATEA Telephone number	ZIP CODE A

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Federal Election Commission ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS The FEC added this page to the end of this filing to indicate how it was received.				
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USPS Express Mail	Postmarked			
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Received from Senate Public Records Office	Date of Receipt			
Received from Electronic Filing Office	Date of Receipt			
Other (Specify):	Date of Receipt or Postmarked			
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PREPARER (3/2005)	DATE PREPARED			

EXHIBIT G

FE6AN026

# REPORT OF RECEIPTS

FEC FORM 3X	AND DISBURS For Other Than An Auti			Office Use Only
NAME OF COMMITTEE (in full)	USE FEC MAILING LABEL OR TYPE OR PRINT	Example:If typing, type over the lines		
REAGAN PAC			_           .  _	<u></u>
ADDRESS (number and street)	3699 WILSHIRE BLVD., #1	1290 		<u></u>
Check If different than previously reported. (ACC)	LOS ANGELES		LCA L	90010
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July 31 Mid-Year Report(Non-electl Year Only) (MY) Termination Report (TER)	Post -Election Report for the:	General (30G)	Runoff (30)	R) Special (30S) in the State of
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I certify that I have examined this  Type or Print Name of Treasurer	Report and to the best of my known	owledge and bellet it is true, corre	ect and complete.	
	onically Filed by DANA W RE		Date 02	19 2010 Denalties of 2 U.S.C 437g.
Office Use Only				FEC FORM 3X (Rev. 12/2004)

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	SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS		Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER:   PAGE 6/10 (check only one)
	Any information copied from such Reports and or for commercial purposes, other than using the	Statements may ne name and add	y not be sold or used by any per dress of any political committee	son for the purpose of soliciting contributions to solicit contributions from such committee.
	NAME OF COMMITTEE (In Full) REAGAN PAC			
A.	Full Name (Last, First, Middle Initial) AMERICANS IN CONTACT PAC			Date of Receipt
	Mailing Address PO BOX 204			01 31 2010
	City	State	Zip Code	Transaction ID: INC.A.118
	ALEXANDRIA	VA	22313	Amount of Each Receipt this Period
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EXHIBIT H

(Rev. 12/2004)

## REPORT OF RECEIPTS

**FEC** AND DISBURSEMENTS FORM 3X For Other Than An Authorized Committee Office Use Only NAME OF **USE FEC MAILING LABEL** Example:If typing, type COMMITTEE (in full) OR TYPE OR PRINT over the lines **REAGAN PAC** 3699 WILSHIRE BLVD., #1290 ADDRESS (number and street) \_\_\_\_1 \_\_\_1 \_\_\_1 \_\_\_\_1 Check if different than previously reported. (ACC) LOS ANGELES CA 90010 سلب الساب الساب الساب ا. ..ا۔ ا۔۔۔ل 2. FEC IDENTIFICATION NUMBER CITY A STATE ZIPCODE A AMENDED IS THIS C00464289 OR REPORT (N) (A) Nov 20 (M11) TYPE OF REPORT (b) Monthly Feb 20 (M2) May 20 (M5) Aug 20 (M8) (Non-Election Year Only) Report (Choose One) Due On: Dec 20 (M12) Sep 20 (M9) Mar 20'(M3) Jun 20 (M6) (Non-Election Year Only) (a) Quarterly Reports: Apr 20 (M4) Jul 20 (M7) Oct 20 (M10) Jan 31 (YE) April 15 Quarterly Report(Q1) Primary (12P) General (12G) Runoff (12R) 12-Day (c) July 15 PRE-Election Quarterly Report(Q2) Convention (12C) Special (12G) Report for the: October 15 Quarterly Report(Q3) January 31 Quarterly Report(YE) in the Election on State of July 31 Mid-Year Report(Non-election 30-Day Special (30S) Runoff (30R) Post -Election General (30G) Year Only) (MY) Report for the: **Termination Report** in the (TER) State of Election on 01 04 2010 30 2010 5. Covering Period through I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete. DANA W REED Type or Print Name of Treasurer Electronically Filed by DANA W REED Signature of Treasurer NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g. Office **FEC FORM 3X** Use Only

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SCHEDULE B (FEC Form 3 ITEMIZED DISBURSEMENT	S lor each category of the	FOR LINE NUMBER: PAGE 6/8 (check only one)
	Detailed Summary Page	27   28a   28b   28c   29   -
Any Information copied from such Reports a or for commercial purposes, other than using NAME OF COMMITTEE (In Full) REAGAN PAC	nd Statements may not be sold or used the name and address of any political	d by any person for the purpose of soliciting contributions committee to solicit contributions from such committee
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Mailing Address 13800 COPPER	MINE ROAD	104 1 191 1 2010 1
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Purpose of Disbursement SOLICITATION CALLS Candidate Name		003 Category/ Type
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Full Name (Last, First, Middle Initial) DAVID POLYANSKY		Transaction ID: EXP.B.389 Date of Disbursement
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EXHIBIT I

PAGE 1 / 239

## **FEC**

# REPORT OF RECEIPTS

AND DISBURSEMENTS FORM 3X For Other Than An Authorized Committee Office Use Only TYPE OR PRINT ▼ NAME OF Example: If typing, type 12FE4M5 COMMITTEE (in full) over the lines. **HUCK PAC** ADDRESS (number and street) Check if different than previously LITTLE ROCK AR 72203 reported. (ACC) 2. FEC IDENTIFICATION NUMBER ▼ CITY A STATE A ZIP CODE 3. IS THIS NEW **AMENDED**  $\boxtimes$ C00448373 OR REPORT (N)(A) 4. TYPE OF REPORT Monthly Feb 20 (M2) May 20 (M5) Nov 20 (M11) Aug 20 (M8) (Choose One) Report (Non-Election Year Only) Due On: Dec 20 (M12) (Non-Election Year Only) Mar 20 (M3) Jun 20 (M6) Sep 20 (M9) (a) Quarterly Reports: Apr 20 (M4) Jan 31 (YE) Jul 20 (M7) Oct 20 (M10) April 15 Quarterly Report (Q1) 12-Day Primary (12P) General (12G) Runoff (12R) July 15 PRE-Election Quarterly Report (Q2) Report for the: Convention (12C) Special (12S) October 15 Quarterly Report (Q3) in the January 31 Election on State of Year-End Report (YE) July 31 Mid-Year 30-Day (d) Report (Non-election POST-Election General (30G) Runoff (30R) Special (30S) Year Only) (MY) Report for the: **Termination Report** in the (TER) Election on State of Covering Period 01 01 30 2011 2011 through I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete. Type or Print Name of Treasurer Bryan Jeffrey 8 mi \* in + 1 Bryan Jeffrey 1 06 [Electronically Filed] Signature of Treasurer Date 2012 NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penaltiles of 2 U.S.C. §437g. Office FEC FORM 3X Use Rev. 12/2004

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## SCHEDULE A (FEC Form 3X)

SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS		Use separate s for each catego Detailed Summ	ry of the	FOR LINE (check only	one)	PAGE	108 OF 239
Any information copied from such Reports and or for commercial purposes, other than using the	Statements ma e name and a	l ay not be sold or u address of any poli	sed by any pe ical committee	rson for the	purpose of :	soliciting co	ontributions
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## SCHEDULE B. (FEC. Form 3X)

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Full Name (Last, First, Middle Initial)		. [	
A. ccAdvertising			Date of Disbursement
Mailing Address 5900 Fort Drive Suite 302			05 23 2011
City	State Zip Code		Transaction ID : SB21B.4453
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Senate President	ment For: Primary ☐ General Other (specify) ▼	··· · · · · · · · · · · · · · · · · ·	
State: District:			
Full Name (Last, First, Middle Initial)  C. Judith A. Crouch			Date of Disbursement
Mailing Address 59 Belmont Drive			01 14 2011
Little Rock	State Zip Code AR 72204		Transaction ID : SB21B.40503
Purpose of Disbursoment Payroll			
Candidate Name			Amount of Each Disbursement this Period
		Calegory/ Type	1299.36
Senate President	nent For: Primary Goneral Other (specify)		r. r
State: District:			
SUBTOTAL of Disbursements This Page (optional)		<b>-</b>	12448.75
TOTAL This Period (last page this line number only		<b>)</b>	

**EXHIBIT J** 

PAGE 1 / 395

**FEC** FORM 3

### REPORT OF RECEIPTS AND DISBURSEMENTS

	For An Authorized	Committee	Office	Use Only
1. NAME OF COMMITTEE (in full)	TYPE OR PRINT ▼	Example: If typing, type over the lines.	12FE4M5	1.1
Steve Daines for Monta	na			
		<del> </del>	<del>-                                     </del>	
	J PO Box 1598	<del> </del>	<del></del>	
ADDRESS (number and street)		<del>                                     </del>	<del></del>	
Check if different than previously reported. (ACC)	Helena		MT 59624	<del></del>
2. FEC IDENTIFICATION NU	MBER ▼ <u>CIT</u>	Υ.Δ.	STATE A	ZIP CODE A STATE ▼ DISTRICT
C C00491357	3. IS THE		AMENDED (A)	MT 00
4. TYPE OF REPORT (Cho (a) Quarterly Reports:  April 15 Quarterly Re  July 15 Quarterly Re	(b) 12-Da	Primary (12P)  Convention (12C)	General (12G) Special (12S)	Runoff (12R)
October 15 Quarter	y Report (Q3) Elect	lon on	17 7 1	In the State of
January 31 Year-End	d Report (YE) (c) 30-Da	y POST-Election Report for the	e: Runoff (30R)	Special (30S)
Termination Report	•	m m'' d d cion on + i .	, v v v v	in the State of
5. Covering Period 07	s Report and to the best of	through 09 my knowledge and belief it is		2012 aplete.
Signature of Treasurer	Loma Kuney	[Electronically Filed]	Date 10 /	15 ' 2012 Y
NOTE: Submission of false, errone	ous, or incomplete information	n may subject the person signing	y this Report to the pe	nalties of 2 U.S.C. §437g.
Office Use Only				EC FORM 3 (Revised 02/2003)

SCHEDULI	EΑ	(FEC	Form	3)
ITEMIZED	REC	EIPTS	3	

SCHEDULE A (FEC Form 3)		Use separate schedule(s) for each category of the	FOR LINE NUMBER: PAGE 241 OF 395 (check only one)					
TEMIZED RECEIPTS		Detailed Summary Page	118 11b X 11c 11d					
Any information copied from such Reports and S or for commercial purposes, other than using the			person for the purpose of soliciting contributions ee to solicit contributions from such committee.					
NAME OF COMMITTEE (In Full) Steve Daines for Montana								
Full Name (Last, First, Middle Initial) American Dental PAC			Date of Receipt					
Mailing Address 1111 14th St NW #1100			09 18 2012					
City	State DC	Zlp Code 20005	Transaction ID : 21006.C7178					
Washington FEC ID number of contributing								
federal political committee.	'C'; co	0000729	Amount of Each Receipt this Period					
Name of Employer	Occupation	١	2000.00 !					
Receipt For: 2012	Election C	ycle-to-Date						
Primary General Other (specify)		2000.00						
Full Name (Last, First, Middle Initial) Americans in Contact PAC			Date of Receipt					
Mailing Address 13800 Coppermine Rd			09 25 2012					
City Herndon	State VA	Zip Code 20171	Transaction ID : 21006.C7381					
FEC ID number of contributing federal political committee.	C co	0455444	Amount of Each Receipt this Period					
Name of Employer	Occupation	n						
Receipt For: 2012 Primary General Other (specify)	Election C	ycle-to-Date 3000.00	i					
Full Name (Last, First; Middle Initial) Arch Coal, Inc PAC	<del>, , , , , , , , , , , , , , , , , , , </del>		Date of Receipt					
Mailing Address One City Place Dr			4 M / In 0 / Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y					
City Saint Louis	State	Zip Code 63141	Transaction ID : 21005.C6659					
FEC ID number of contributing federal political committee.	C co	0167668	Amount of Each Receipt this Period					
Name of Employer	Occupation	1	2000.00 Receipt					
Receipt For: 2012	Election C	ycle-to-Date						
Other (specify)		6000.00						
SUBTOTAL of Receipts This Page (optional)			4500.00					
			-					

EXHIBIT K

16044394321

# REPORT OF RECEIPTS AND DISBURSEMENTS

	Authorized Committee	Office Use Quly
NAME OF COMMITTEE (In full)  TYPE OR PRII  TYPE OR PR	NT ▼ Example: If typing, type over the lines.	1 12FE4M5
Steve Daines for Montana	<u> </u>	
<u> </u>	111111111111	
ADDRESS (number and street)		
Check if different than previously reported. (ACC)		MT [59624
2. FEC IDENTIFICATION NUMBER ▼  C C00491357	3. IS THIS NEW REPORT (N) OR	STATE ZIP CODE STATE ▼ DISTRICT  AMENDED  MT 00  MT 00
4. TYPE OF REPORT (Choose One)  (a) Quarterly Reports:  April 15 Quarterly Report (Ω1)  July 15 Quarterly Report (Ω2)  October 15 Quarterly Report (Ω3)  January 31 Year-End Report (YE)	-	and the second s
. Termination Report (TER)	1 2	' Runoff (30R) 1 Special (30S)  In the State of
5. Covering Period 10 , 01	2012 through 10	M / D / Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y
I certify that I have examined this Report and Type or Print Name of Treasurer Lorna Kune Signature of Treasurer Lorna Kuney		true, correct and complete.  M M / D D / Y Y Y Y  Date
NOTE: Submission of false, erroneous, or incomp Office Use Only FESAND18	blete information may subject the person signing	this Report to the penalties of 2 U.S.C. §437g.  FEC FORM 3 (Revised 02/2003)

SCHEDULE B (FEC Form 3) TEMIZED DISBURSEMENTS	Use separate schedule(s) for each category of the Detalled Summary Page	FOR LINE NUMBER:   PAGE 50 0F 05   (check only one)
Any information copied from such Reports and Statements or for commercial purposes, other than using the name an		y person for the purpose of soliciting contributions
NAME OF COMMITTEE (In Full)  Steve Daines for Montana	o address of any political commit	titee to solicit continuations from soon committee.
Full Name (Last, First, Middle Initial)  A. Caras Real Estate  Malling Address PO Box 7666		Date of Disbursement  NAME / DESCRIPTION OF 2012
		L. Jane Nagand Branders and
City State Missoula MT	Zip Code 59807-	Amount of Each Disbursement this Period
Purpose of Disbursement Office Space Rent Candidate Name	Categor	352.83 Transaction ID : 21019.E1751
Office Sought:  House Senate President  Disbursement for the prime of		OFFICE SPACE RENT
Full Name (Last, First, Middle Initial)		
B. ccAdvertising		Date of Disbursement
Mailing Address 5900 Fort Dr #302		10 12 2012
Clty State	Zip Code	Amount of Each Disbursement this Period
Centreville VA Purpose of Distrursement	20121-	1000.00
Voter Survey		Transaction ID : 21019.E1792
Candidate Name	Categor Type	y/
ا السا	,	VOTER SURVEY
State: District: Full Name (Last, First, Middle Initial)		
c. Caleb Chestnut		Date of Disbursement
Mailing Address 1080 Glory Ln		10 01 2012
City State	Zip Code	Amount of Each Disbursement this Period
Bozeman MT Purpose of Disbursement Payroll	59715-	107.86
Candidate Name	Categor Type	Transaction ID : 21013.E1722
Office Sought: House Disbursement   Senate   Prime   Other   State: District:	For:	PAYROLL
SUBTOTAL of Disbursements This Page (optional)		1460.69
TOTAL This Period (last page this line number only)		

EXHIBIT L

16044394524

#### **About AICPAC**

#### Our Mission

The mission of Americans in Contact PAC (AICPAC) is to identify social and fiscal empowaries throughout America and sugage them at the Grassmore level in the political process of elections and legislation at all levels of Covernment (local, county, state and federal).

#### Our Goal

The goal of AICPAC is to identify the political opinions and preferences of the 120,000,000 bornes in America that are contained in proprietary databases to which AICPAC has access.

#### Our Vision

The vision of AICPAC is to activate, educate, mobilize, as well as turnout to vote, those it has identified to support an 'One Nation Under Gol,' that will 'hold certain truths to be self-evident and support the fact that all men are created equal and that they are endowed by their Creater with certain unallegable Rights, that among these are Life, Liberty and the pursuit of Happiness.' (Declaration of Independence, July 4, 1776)

To request more information on Americans In Contact PAC, please submit an inquiry by clicking here.



#### اعتدا

- tion of 'Anti-Choire' Messages Stop California Sh 323 in the Tracks! SCOTUS & Same-Sea Messages

nto in Contact RAC ( we waterfrontierenters org ly American in Contact PAC ( ) waster out by any resoluti man, All Rights Reserved.

**EXHIBIT M** 



Home Capabilities Clients News About Us Contact Us

Search our site:

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### client login

Usemame:

Password:

Lost password?

### capabilities



- 1. Market Research
- 2. <u>Franklug</u>
- 3. Lobbying
- 4. International
- 5. List Services

#### ccAdvertising is your answer for turn-key communications solutions that worki

ccAdvertising's goal of providing quality communication and information services at an affordable price allows for great results for clients with any size budget. Clients range from congressional elections to local supervisor races, from international companies to local corner shops - no client is too small!

The versatile ccAdvertising process of interactive automated telephone surveys and messages is easily adaptable to meet a wide variety of client needs, including:

- · Voter Identification, Education, Persuasion and Turn-Out
- Get Out the Vote Calls
- Pranking Services for Congressional Offices
- Lobbying
- International Surveys
- Up-to-date List Services
- Lead Generation
- · Market and Product Research
- Donor Acquisition

ccAdvertising is capable of conducting 3,000,000 phone calls per day and campaigns can often be commenced for a new client within 24 hours of first contact with ccAdvertising. For established clients with urgent needs for immediate action, it is possible to script, produce and commence a call campaign in as little as 2 hours.

#### RETURN TO TOP

#### market and product research

Are my customers satisfied with my product? Am I reaching out to people who might be interested in what I offer? How can I be sure that my clients and potential customers find out about special events and sales? Do I need to know more about my key customers?

In today's competitive business world, understanding consumer behavior is the key to increasing revenue. With the ability to accurately identify the wants, needs and interests of large demographics, ccAdvertising clients are able to target potential and current customers, find out who uses what product, develop sales leads, and inform interested parties about various offers and events. All this is done through something everyone owns - a telephone.

Clients receive all the information collected by surveys including name, address, phone number, longitude and latitude, adjusted gross income, and how each respondent answered every question. Powerful analysis tools, such as a cross tabulation report, are available to assist in evaluating surveys as well.

#### RETURN TO TOP

#### franking services

ccAdvertising employs proprietary personalized artificially intelligent interactive telephone surveys

(patents pending) to conduct district-wide franking surveys in a Representative's voice.

ccAdvertising is pleased to have served as a franking vendor to several Members of Congress Including Roy Blunt, Mike Conaway, Henry Bonilla, Ander Crenshaw, Tom DeLay, Katherine Harris, Ernest Istook, Darrell Issa, and Kay Granger. Please take the time to read Congressman Conaway's Dear Colleague Letter, which was written after the Congressman had completed his own unique franking survey with ccAdvertising.

ccAdvertising uses state-of-the-art databases and client-provided files (voter or office files) to provide coverage over all of the targeted congressional districts. Using the ccAdvertising system, congressional clients are able to effectively communicate with constituents in a meaningful and personalized way that increases Representative favorability with constituents and obtains responses from great numbers of constituents regarding current issues in Congress.

ccAdvertising provides all the data back to the Congressional office in formats requested, including name, address, phone number, latitude and longitude, State House District, State Senate District, Congressional District, all voter file data associated with the home (if voter file is provided), as well as how the respondent answered each question.

RETURN TO TOP

#### lobbying

ccAdvertising uses its unique system to motivate constituents at the grassroots level. Our clients do this by informing respondents about important issues facing them and their district and by motivating them to take action, such as calling their elected official to voice the desired opinion, attend meetings, or call friends and family. A great influx of phone calls from voters concerning one topic is an excellent way to get the attention of a government official.

The system can be programmed to generate a client specified number of calls to a government office per day; this allows for a steady stream of calls to be made by voters. This powerful tool can be used to stop legislation or to push legislation through. To listen to an example of a lobbying survey, please click on one of the buttons below.

RETURN TO TOP

#### international .

ccAdvertising has recently begun expansion into India and China. In the international business environment, possessing useful, current information on buying habits and patterns of consumers is the only way for companies who operate internationally to compete in a meaningful way.

With the growing globalization of commerce, companies need more and more information on consumer buying behavior in countries around the world.

ccAdvertising is in the process of meeting the needs of international companies by developing an extensive database of mobile phone numbers in both China and India. These lists will be accumulated and provided for specific client needs such as market research, promotions and communication.

RETURN TO TOP

#### list services

ccAdvertising maintains an extensive, two-week current database of 120,000,000 homes in America. This database is suitable for mailing lists and phone lists.

Due to the high accuracy rate and the extensive number of phone numbers stored, ccAdvertising has been able to categorize many individuals based on many factors, including:

- Age
- Gender
- Political issue preference (i.e. pro-life, pro-traditional marriage, etc)
- Political party alignment
- Historical contributor
- Candidate preference and many others just ask!

With this wealth of information, clients are able to target people based on any number of criteria. This allows for accurate mailing and phone lists for clients who seek to reach out to people using live operators or direct mail initiatives. For more information about how ccAdvertising's list services can help your organization, please contact us at 703-234-2200.

EXHIBIT N

Image# 12940371445

PAGE 1/9

FEC FORM 3X

FE6AN025

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

							Office Use O	nty
1. NAME OF COMMITTEE (in fu		OR PRINT V		mple: If typin the lines.	g, type	12FE4M5	· · · · ·	
Americans In Co						 		
ADDRESS (number and	street)	O. Box 204	<u> </u>	<u>i.d. 1.1</u>	احطاد الحا			
Check if differentian previously reported. (ACC	, ΔΙ	exandria	<u></u>	1111		VA L-1	22313	
2. FEC IDENTIFICAT	TION NUMBE	R ▼	CITY A		s	TATE A	ZIP	CODE A
C C00455444	اد الاستان م	1 3	B. IS THIS REPORT		IEW N) OR	AA (A)	MENDED	
July 15 Quarterly October 1 Quarterly January 3 Year-End July 31 M	Report (Q1) Report (Q2) Report (Q3) Report (YE) Report (YE) d-Year on-election	(d) 30-Day POST-Election Report for the	lection on	: 1 1 1	12C)	General Special	(12S) In St	Nov 20 (M11) (Non-Election Year Only) Dec 20 (M12) (Non-Election Year Only) Jan 31 (YE) Runoff (12R)  the ale of VA  Special (30S)
5. Covering Period	M M /	י מ ע י ט ע · O1 , 20	)12 1	through	10	17	2012	٧
I certify that I have exa Type or Print Name of Signature of Treasurer NOTE: Submission of fal	Treasurer Gi	abriel S. Joseph III	-	Electronically	• Filed  Da	м ' ate 10	. 22	
Office Use Only	ļ							ORM 3X 12/2004

## SCHEDULE B (FEC Form 3X)

·	EMIZED DISPUIDSEMENTS	Use separate schedule(s)				IUMBER:		<u>  P/</u>	AGE		<u>)⊦ 9</u>				
i <b>L</b>	EMIZED DISBURSEMENTS	for each category of the Detailed Summary Page	10		only 21b	one) 22	23	24	[	25	☐ <sup>26</sup>				
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7	NAME OF COMMITTEE (In Full)	<del></del>													
$\langle$	Americans In Contact PAC														
_	Full Name (Last, First, Middle Initial)				$\neg$										
A.	ccAdvertising					Date of Disbursement									
	Mailing Address 5900 Fort Dr Ste 302		•		10 01 2012										
	-	tate Zip Code			$\dashv$	Transaction ID : 21021.E447									
	Centreville Purpose of Disbursement	VA 20121-2425				178115	acuon IL	2 1021.	/ 44ن						
	PAC Surveys/Cont Fulfillment		1	•	3	Amount of Each Disbursement this Pariod									
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	Office Sought:   House Disbursom	ient For:	<u>·</u>	, F 0	$\dashv$										
		Primary General		PAC SU	JRVEYS/	CONT FU	ONT FULFILLMENT								
	President State: Oblitict:	Other (specify) ▼													
	Full Name (Last, First, Middle Initial)				$\dashv$						<del></del>				
В,	Global Payments					Date of	Disburs	ement							
	Mailing Address 10705 Red Run Blvd	$\dashv$	10 02 2012												
	City S														
	Owings Mill	itate Zip Code MD 21117-			-	Trans	action I	) : <b>21021</b>	.E455						
	Purpose of Disbursement PAC Credit Card Processing		1		Amount of Each Disbursement this Perlod										
	Candidate Name		- E												
	Category/ Type						<b>**</b>	-		575	5.42				
	Office Sought: House Disbursem			-	$\neg$										
	1.1	Primary General				PAC CF	REDIT CA	ARD PRO	CESS	SING					
	State: District:	Other (specify) ▼													
	Full Name (Last, First, Middle Initial)				-			•							
C.	Koch & Hoos, LLC				- 1		Disburs								
						5 M · M · / 10 5 D 5 / Y Y Y Y									
	Mailing Address P.O. Box 1154					1 10		15		)12					
	•	tate Zip Code				Trans	action It	21021	E449						
	Alexandria Purpose of Disbursement	VA 22313-				•									
	PAC Accounting Consulting		.	Amount of Each Disbursement this Perio											
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EXHIBIT O

FE6AN026

image# 12972547527

### **REPORT OF RECEIPTS AND DISBURSEMENTS**

PAGE 1 / 12

FUNIVI 3A	For Other Than An Au	uthorized Committee	
<u></u>			Office Use Only
1. NAME OF COMMITTEE (in full)	TYPE OR PRINT ▼	Example: If typing, type over the lines.	12FE4M5
Americans In Contact	t PAC		
			·
ADDRESS (number and street)	P.O. Box 204		
	1		
Check if different than previously reported. (ACC)	Alexandria		VA 22313 -
2. FEC IDENTIFICATION N	NUMBER ▼ C	DITY A	STATE ▲ ZIP CODE ▲
C C00455444	3.	IS THIS NEW REPORT (N)	DR (A)
4. TYPE OF REPORT (Choose One)	Report المحادثة	eb 20 (M2) May 20 (	Year Only)
(a) Quarterly Reports:	L M	tar 20 (M3) 1 Jun 20, (	Year Only)
April 15 Quarterly Report	(01)	pr 20 (M4)	
July 15 Quarterly Report	(Q2) (c) 12-Day PRE-Election	Primary (12P)	General (12G) Runoff (12R)
October 15 Quarterly Report	Report for the:	Convention (12C)	Special (12S)
January 31 Year-End Report	(YE) Elec	etion on '	n the State of
July 31 Mid-Year Report (Non-elect Year Only) (MY)			Runoff (30R) Special (30S)
Termination Repo	ort	ction on	in the State of
5. Covering Period	тм / го о / , ч ч 07 ; , 01 2012	y y through 0	9 30 2012 .
certify that I have examined	this Report and to the best	of my knowledge and belief it	is true, correct and complete.
Type or Print Name of Treasu	•		<u>.</u> .
Signature of Treasurer Ga	abriel S. Joseph III	[Electronically Filed]	Date 10 15 2012
NOTE: Submission of false, erro	oneous, or incomplete informat	tion may subject the person sign	ing this Report to the ponalties of 2 U.S.C. §437g.
Office Use			FEC FORM 3X Rev. 12/2004
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## SCHEDULE B (FEC Form 3X)

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TEMIZED DISBURSEMENTS	for each category of the Detailed Summary Page	(check anly	one) 22   23   24   25   26							
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Any information copied from such Reports and Statem or for commercial purposes, other than using the name										
NAME OF COMMITTEE (In Full)										
Americans In Contact PAC										
Full Name (Last, First, Middle Initial)		•	Pote of Giologopas							
A. Global Payments			Date of Disbursement							
Mailing Address 10705 Red Run Blvd	08 02 2012									
City		Transaction ID : 21014.E433								
Owings Mill Purpose of Disbursemont										
PAC Credit Card Processing	1		Amount of Each Disbursement this Period							
Candidato Name		Category/ Type	81.22							
Office Sought: House Disbursem	- · · · <del>-</del> ·									
	Primary ☐ General Other (specify) ▼		PAC CREDIT CARD PROCESSING							
State: District:										
Full Name (Last, First, Middle Initial)										
Global Payments		Date of Disbursement								
Mailing Address 10705 Red Run Blvd	08 05 2012									
City		Transaction ID : 21014.E434								
Owings Mill Purpose of Disbursement										
PAC Credit Card Processing			Amount of Each Disbursement this Period							
Candidate Name		Category/ Type	645.67							
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- HQ Global Workplaces	i	Date of Disbursement								
Mailing Address 1200 G St, NW, Suite 800	07 23 2012									
· · · · · · · · · · · · · · · · · · ·	tale Zip Code		Transaction ID : 21014.E420							
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PAC Rent		Amount of Each Disbursement this Period								
Candidate Namo		Calegory/ Type	200.00							
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1 1 1 1 1	Primary General		PAC RENT							
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SUBTOTAL of Disbursements This Page (optional)			926.89							
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## SCHEDULE B (FEC Form 3X)

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Α.	HQ Global Workplaces									Dale of Disbursement  M. M. J. D. D. J. J. Y. Y. Y. Y. Y. Y. Z. J. Z.									
	Mailing Address 1200 G St, NW, Suite 800									į	2	3	, f	2012	. 1				
	City Washington										Transaction ID : 21014.E421								
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										_	3		• •						
	City Washington			State DC	Zip Code 20005-			ļ	Trans	sacti	on ID	: 21	014.E4	122					
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	Mailing Address PO Box 96064								. <b>0</b> 9	į	2	1	<b>,</b> , ,	2012	•				
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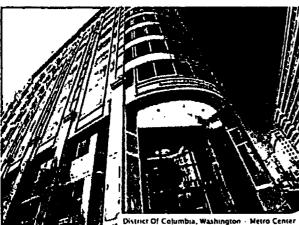
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